

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT
OF NORTH CAROLINA**

THOMAS H. KRAKAUER,)	CASE NO. 1:14-CV-00333-CCE-JEP
)	
Plaintiff,)	
)	
-vs-)	
)	
DISH NETWORK L.L.C.,)	<u>JOINT PROPOSAL ON REDACTION OF</u>
)	<u>DOCUMENTS AND FILING UNDER SEAL</u>
Defendant.)	
_____)	

Pursuant to the Court’s Order (Doc. 132) regarding the filing the of redacted documents, Plaintiff Thomas Krakauer and Defendant DISH Network L.L.C. (“DISH”) submit this Joint Proposal on Redaction of Documents Under Seal.

On November 11, 2015, this Court issued an Order leaving certain documents under seal, and directing the Parties to submit a Joint Proposal on handling redaction of documents to be filed in this action going forward, and to identify documents of any previously filed documents that should be re-assessed. Given the Court’s ruling that names, telephone numbers, and addresses of class members and other third-parties be filed under seal, going forward the Parties will redact documents containing names, addresses and telephone numbers for public filing, with unredacted versions filed under seal.

As identified in Order 132, Documents 48-4, 71-5, 129-2, 129-3, and 129-5 include names, addresses, and/or phone numbers that should be replaced with redacted versions. In addition, the Parties identify the following documents which should be replaced with redacted filings:

- Doc. 48-2 (Plaintiff filing, contains phone numbers)
- Doc. 48-3 (Plaintiff filing, contains phone numbers)
- Doc. 56-12 (DISH filing, contains names, phone numbers, and addresses)
- Docs. 56-18 through 56-25 (DISH filing, contains names and/or phone numbers)

The Parties will continue to confer regarding the finalizing of the redactions on the documents outlined above and will endeavor to submit redacted copies of the above exhibits by December 9, 2015.

Respectfully submitted,

/s/ Edward A. Broderick

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CERTIFICATE OF SERVICE

The foregoing Joint Submission was filed electronically on December 1, 2015. Notice of this filing will be sent to all parties registered with the Court's electronic filing system by operation of the Court's system. Parties may access this filing through the Court's electronic filing system.

/s/ Edward A. Broderick
One of Plaintiff's Attorneys